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Attorneys for defendant
ZELDA SANCHO, LVN**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

M.H., et al.,

Plaintiffs,

v.

COUNTY OF ALAMEDA, et al.,

Defendants.

CASE NO: C11-2868 JST (MEJ)

**AMENDED REQUEST THAT THE
PERSONAL ATTENDANCE OF
ZELDA SANCHO AT THE 1/27/15
SETTLEMENT CONFERENCE BE
EXCUSED AND DECLARATION IN
SUPPORT : ORDER**

MS. SANCHO is employed as a charge nurse at a convalescent facility in Alameda and is scheduled to be working on January 27, 2015. As explained in the original request, MS. SANCHO has a limited amount of leave time which she must use wisely, sparingly and periodically to attend the trial of this matter. She must give at least two weeks prior notice of the use of any time other than sick leave. She is also the caregiver for her elderly, disabled father and the support for both him and her son.

While taking an unexcused day off to attend a settlement conference would constitute an extraordinary and unjustified hardship upon her, MS. SANCHO can make arrangements to take BART to San Francisco on the morning of January 27, 2015 and can attend the settlement conference from 10:00 a.m. until approximately 12:30 p.m. when she will have to leave to catch BART and return to her job. She can be available by telephone for the remainder of the day, if necessary.

1 Plaintiffs' attorneys had previously expressed no objection to any defendant
 2 asking the Court to allow telephonic appearance. (See Declaration of Martha M.
 3 Stringer, Exhibit "A") Once informed of MS. SANCHO'S availability for several hours at
 4 the settlement conference, they also expressed no objection. (See Declaration of
 5 Martha M. Stringer, Exhibit "B")

6 For these reasons, ZELDA SANCHO would ask the Court to permit her to
 7 appear for 2.5 hours at the January 27, 2015 settlement conference and then to be
 8 available by telephone for the remainder of the conference.

9 Dated: January 14, 2015

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 11
 12 Dated: January 16, 2015



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 14 **DECLARATION OF MARTHA M. STRINGER**

15 I, Martha M. Stringer, declare:

16 1. I am an attorney duly licensed to practice law before all courts in the State
 17 of California and before the United States District Court for the Northern District of
 18 California.

19 2. I am an attorney with Williams & Associates, attorneys of record for
 20 defendant Zelda Sancho in the above-referenced matter.

21 3. Attached hereto as Exhibit "A" is a true and correct copy of an e-mail
 22 exchange dated January 6, 2015, confirming that the plaintiffs had no objection to any
 23 defendant asking the Court to allow a telephonic appearance at the settlement
 24 conference.

25 4. Attached hereto as Exhibit "B" is a true and correct copy of an e-mail
 26 exchange dated January 14, 2015, confirming that the plaintiffs have no objection to
 27 Zelda Sancho appearing for 2.5 hours at the settlement conference and then being

1 available by telephone thereafter.

2 I declare under penalty of perjury under the laws of the United States of America
3 that the foregoing is true and correct. Executed this 14th day of January, 2015, in
4 Sacramento, California.

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6 /s/ Martha M. Stringer
7 MARTHA M. STRINGER
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EXHIBIT "A"

Nancy Hudgins

From: Haddad & Sherwin
Sent: Tuesday, January 06, 2015 6:51 PM
To: 'Nancy Hudgins'
Cc: 'Catherine Koss'; 'Carol Ho'; 'Matt Grigg'; 'Jeff Hunter'; 'Randy Andrada'; 'Martha Stringer'; 'Richard Friedman'; 'Haddad & Sherwin'
Subject: RE: Harrison Settlement Conference

We have no objection to Defendants asking the Court to allow anyone from their side to appear by telephone.

Julia Sherwin
(510) 452-5500



505 Seventeenth Street, Oakland CA 94612
www.haddadsherwin.com

From: Nancy Hudgins [<mailto:neh@hudginslaw.com>]
Sent: Tuesday, January 06, 2015 6:13 PM
To: Haddad & Sherwin
Cc: Catherine Koss; Carol Ho; Matt Grigg; Jeff Hunter; Randy Andrada; Martha Stringer; Richard Friedman
Subject: Re: Harrison Settlement Conference

Britt Herron and I are available both dates. Can Dr. Orr appear by telephone?

Sent from my iPhone

On Jan 6, 2015, at 5:21 PM, Haddad & Sherwin <haddad.sherwin@sbcglobal.net> wrote:

All, We got a call from Jeff Hunter asking for the settlement conference to be January 21st. That date does not work but we could do January 16 or 23rd. Unfortunately Mike is going to be on a plane on Friday and I have meetings in the morning, but I could do a call with the court on Friday afternoon any time from 1:00 p.m. Pacific time on.

Julia Sherwin
(510) 452-5500



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From: Haddad & Sherwin [<mailto:haddad.sherwin@sbcglobal.net>]
Sent: Tuesday, January 06, 2015 4:07 PM
To: 'Nancy Hudgins'; 'Catherine Koss'; 'Carol Ho'; 'Matt Grigg'; 'Jeff Hunter'; 'Randy Andrada'; 'Martha

EXHIBIT "B"

Martha Stringer

From: Haddad & Sherwin [haddad.sherwin@sbcglobal.net]
nt: Wednesday, January 14, 2015 12:06 PM
o: Martha Stringer
Cc: 'Haddad & Sherwin'; 'Richard Friedman'; genevieve.guertin@sbcglobal.net; 'T. Kennedy Helm'
Subject: RE: Zelda appearance at settlement conference and stip re LVN Board fine testimony
Attachments: Stip.Sancho BVNPT Fine.docx

Hi Martha, We have no objection to Zelda Sancho leaving the settlement conference to return to work. Also, a proposed stipulation concerning the BVNPT fine is attached. Please let me know if you agree to it and we will file it with the Court. Thanks very much, Julia

Julia Sherwin
(510) 452-5500



505 Seventeenth Street, Oakland CA 94612
www.haddadsherwin.com

From: Martha Stringer [mailto:MStringer@williamslegal.net]
Sent: Wednesday, January 14, 2015 10:04 AM
To: 'Haddad & Sherwin'
Subject: Zelda appearance at settlement conference and stip re LVN Board fine testimony

Julia,

The court clerk suggested I contact you about Zelda's personal appearance at the MSC on the 27th. It was my understanding that you had no objections to telephonic availability, but I have made arrangements for Zelda to personally attend between 10 and 12:30 when she must return to work. She can be available by telephone the remainder of the day, if necessary. Is that ok with you? Also, with respect to the fine issue, do you want a formal stipulation or will the e-mail chain suffice after you provide an answer?

Marty

Martha M. Stringer
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